

The Law Offices of
ANDREW J. FRISCH, PLLC
40 Fulton Street, 17th Floor
New York, New York 10038
212-285-8000

May 10, 2023

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (AMD)

Dear Judge Donnelly:

I submit this letter on Mr. Mackey's behalf to request an additional short extension of time to file his post-verdict motions from today until 48-hours from the time of the Court's ruling on the pending sealing issue. Mr. Mackey's motion papers are substantially complete except for housekeeping and compliance with the Court's prospective order on sealing. Meanwhile, I need to turn my attention right now (6:00 a.m.) to a hearing (with witnesses) today in Westchester from which I will not return to my computer probably until after 6:00 p.m. later today. If the Court rules on the sealing issue today, I would need tomorrow to complete my work and could file no later than Friday (and possibly tomorrow). But if the Court cannot rule today, I respectfully request 48 hours from the ruling.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: U.S. Attorney's Office